REMARKS

In the Office Action, the Examiner rejected claims 1-46. Applicants, however, respectfully assert that the instant claims are patentable and in condition for allowance. In view of the following remarks, Applicants respectfully request reconsideration and allowance of the instant claims.

In the Office Action, the Examiner presented a single rejection. Specifically, the Examiner rejected all of the pending claims under 35 U.S.C. § 102(b) as anticipated by the Rolnik et al. reference (U.S. Patent No. 5,801,707). Applicants respectfully traverse the rejection. In summary, Applicants respectfully assert that the Rolnik et al. reference fails to disclose all of the features recited in the instant claims.

A *prima facie* case of anticipation under 35 U.S.C. § 102 requires a showing that each limitation of a claim is found in a single reference, practice or device. *In re Donohue*, 226 U.S.P.Q. 619, 621 (Fed. Cir. 1985). As demonstrated below, the Rolnik et al. reference fails to disclose all of the features recited in the instant claims.

By way of background, the present invention relates generally to a technique for accessing data from networked components and building a physical view of a system based on the accessed data. *See* Application, p. 1, ll. 7-9. By way of example, the technique makes use of data stored *within the individual components*. *See id.*, p.2, ll. 12-15. For example and as discussed in the application, the network 14 includes various components 32 assigned various tasks. *See id.*, p. 7, ll. 1-16; Fig. 1. When assembled in an enclosure set 34, the components may be represented as having a specific location, represented as coordinates 58 and 60. *See id.*, p. 8, ll. 6-9; Fig. 1. Certain components 32 *include* a memory circuit 78 that has one or more dedicated objects, e.g., memory objects 80 and 82, which are allocated for specific data representative of the system. For example, a memory object 80 of the component 32 may maintain data representative of the physical location of the component 32 in the enclosure. *See id.*, p. 11, ll. 12-30.

Accordingly, a user may poll the various components 32 to develop a physical layout of the component assembly 34. *See id.*, p. 16, ll. 1-18. That is, a physical representation or layout of the competent assembly is developed by accessing the memory objects (e.g. 100 or 102) of each component, which includes physical location data, for instance. *See id.* Thus, a physical layout or depiction 146 (as illustrated in Fig. 8 of the present application) can be reconstructed even without specific information or preprogramming of the depiction within a monitoring station. *See id.*, p. 16, ll. 9-11. With the foregoing in mind, Applicants respectfully assert that the instant claims are not anticipated by the Rolnik et al. reference.

Independent Claims 1, 14, 24, 32, and 39 and the Claims Depending Therefrom

In a broad sense, each of the pending independent claims recites storing data representative of the physical configuration of the component in a memory object of the component. Specifically, the pending independent claims recite:

> Claim 1: "storing in a memory object *of each component* data representative of the respective component and of a physical configuration of the component;"
>
> Claim 14: "storing component designation data and the *physical* location data for each component *in a dedicated memory of the respective component*;"
>
> Claim 24: "storing component designation data and *physical* configuration data *in the memory object of each programmable component*;"
>
> Claim 32: "a plurality of electrical components, *each component including a memory object* allocated for component designation data and *physical* location data;" and
>
> Claim 39: a plurality of electrical power control components disposed in an enclosure, *each component including a memory object* for storing component designation data and *physical* configuration data."

(Emphases added). As demonstrated below, the Rolnik et al reference fails to disclose any semblance of a component having a memory object, let alone storing physical configuration data of the component in a memory object of the component, as recited in the instant claims.

The Rolnik et al. reference relates to displaying hierarchical data associated with components and devices of a complex system, such as a cellular network. *See* Rolnik et al., col. 1, ll. 7-10; col. 1, ll. 59-61; Fig. 1. In the system of Rolnik et al., the components of the system are exemplified as a mobile switching center (MSC) 12, a base station controller (CBSC) 14, and base transceiver stations (BTS) 16. *See id.*, col. 2, ll. 6-12; Fig. 1. Because the Rolnik el al. reference relates to cellular networks, it is clear that the components of the Rolnik et al. reference represent actual physical structures, i.e., buildings. The components 12, 14, and 16 each include various devices, e.g., 62, 64, and 66, typically employed in cellular networks. *See id.*, col. 3, ll. 18-20; col. 4, ll. 55-60. The devices of the various components 12, 14, and 16 all communicate via an Ethernet connection with an operation maintenance center (OMC) 20. *See id.*, col. 2, ll. 10-11; Fig. 1. The OMC 20 includes a system processor 40 that includes a memory device 100 to maintain a database 120. *See id.*, col. 2, ll. 28-34; Fig. 2. Particularly, the database 120 includes status data 122 and network relationship data 124 regarding the various components in the system. *See id.*, col. 2, ll. 56-59; Fig. 2. Indeed, Rolnik et al. exemplify the kind of data in the database 120 and the relationship between the components of the network by stating that, "[f]or example, since BTS 16 is coupled to CBSC 14 a network relationship between the BTS 16 and the CBSC 14 would be stored in the network relationship data area 124." *Id.* col. 2, ll.65-col. 3, ll. 3. Thus, all information regarding components and devices of the Rolnik et al. system is stored in a single *central* database 120.

However, in contrast to the instant claims, the *components and devices* of the Rolnik et al. system fail to include any semblance of memory objects. That is, the MSC

12, the CBSC 14, and the BTS 16, which are components disclosed by the Rolnik et al. reference lack any semblance of a memory object, as do their respective devices. Rather, the only memory object disclosed by the Rolnik et al. reference is the memory device 100 of the OMC 20, which stores in a *central database* 120 all of the data for the *entire network.* Accordingly, only by updating the *central database 120* can changes to the components 12, 14 and 16 of the Rolnik et al. system be accounted for. Thus, the Rolnik et al. reference fails to disclose the relationship between component and memory objects recited in the instant claims. Thus, no information is or apparently could be stored *in the "components"* described by Rolnik et al.

Additionally, the database 120 of the Rolnik et al. does not maintain information related to the *physical* location or configuration of the various components 12, 14, and 16. For example, although the database 120 contains information regarding the "relationship between components," there is no reason to believe that this data includes *physical* location or configuration data. *See* Rolnik et al., col. 2, ll. 65-66. Rather, the relationship data in the database includes *hierarchical operational relationships* between the components. *See id.*, col. 3., ll. 6-10. Thus, the object illustrated in Fig. 3 of the Rolnik et al. reference does not represent a *physical* configuration of devices 62, 64, and 66 in the network, but rather a *hierarchical operational relationship*. *See* Rolnik et al., col. 3, ll. 15-25. In other words, Fig. 3 of the Rolnik et al. reference does not illustrate that network device 61 is *physically above* network device 62. *See id.* Rather, this figure illustrates that device 61 of the Rolnik et al. system is above device 62 in an *operational hierarchy*. Thus, the Rolnik et al. reference fails to disclose the *physical location and configuration data* recited in the instant claims.

Therefore, Applicants respectfully assert that the Rolnik et al. reference cannot anticipate independent claims 1, 14, 24, 32, and 39. Moreover, Applicants respectfully assert that dependent claims 2-13, 15-23, 25-31, 33-38, and 40-46 are patentable not only

for their dependencies on an allowable base claim, but also by virtue of the additional features recited therein.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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